

Privacy Notice Body Worn Cameras (BWC) in the Emergency Department (ED)

This notice supplements the main Privacy Notice of Manchester University Hospitals Foundation Trust (the “Trust”) which is available on the internet web pages at: [Privacy Policy - Manchester University NHS Foundation Trust \(mft.nhs.uk\)](https://www.mft.nhs.uk/privacy-policy)

The reason for providing this notice is to make you aware of how your information will be used in relation to the use of Body Worn Cameras (BWC) in the Emergency Department (ED) of the Trust to comply with the Data Protection Act 2018 / UK GDPR, collectively referenced as ‘data protection legislation’.

Please contact us if you have any questions regarding the below.

Our BWC Commitments and Practices	<p>Our use of body worn cameras is governed by internally approved policies and is conducted in accordance with appropriate legislation</p> <p>A number of staff shall operate Body Worn Cameras (BWC).</p> <p>These cameras process video images and audio data of members of the public and people who come into contact with these staff members.</p> <p>BWC shall only be used after a warning has been given and only when an offence is being committed or likely to be committed. Once an incident is over, BWV will be turned off.</p> <p>Areas where BWC is in use shall be clearly marked by visible signage.</p> <p>Recorded footage is secure and encrypted meaning that only authorised staff can access it.</p> <p>In the case of BWC, the operator will not be able to access the footage directly. The Trust shall never continuously record using body worn cameras and will only utilise such technology where there is a legitimate need to do so.</p> <p>In the event that body worn cameras are in operation, Trust operators shall take all reasonable steps to make sure those captured in such footage are made aware that recording is taking place.</p>
Controller contact details	Manchester University NHS Foundation Trust Cobbett House Oxford Road Manchester

	<p>M13 9WL</p> <p>Manchester University NHS Foundation Trust (mft.nhs.uk)</p> <p>ICO Registration ZA282424</p>
<p>Data Protection Officer contact details</p>	<p>By post, using the address above</p> <p>Email: dpo@mft.nhs.uk</p>
<p>Purpose of the processing</p>	<p>The Trust shall use body worn cameras in its ED Department:</p> <ul style="list-style-type: none"> • To protect staff, patients and visitors • To protect Trust premises and Trust assets • To increase personal safety and reduce the fear of crime • To reduce incidents of violence and aggression to staff members • To support the Police in reducing and detecting crime • To assist in identifying, apprehending and prosecuting offenders
<p>Category of personal data being processed</p>	<ul style="list-style-type: none"> • Images of you, where you are, what you do, and who you are with. • Audio of what you say
<p>Lawful basis for processing</p>	<p>The legislation enacted by Parliament that informs the intended processing is as follows,</p> <ul style="list-style-type: none"> • Health and Safety at Work Act 1974 • Section 163 of the Criminal Justice and Public Order Act 1994 • Crime and Disorder Act 1998 • Criminal Procedures and Investigations Act 1996 • Protection of Freedoms Act 2012 • Assaults on Emergency Workers (Offences) Act 2018 <p>The legal basis for processing personal data, in accordance with data protection legislation is:</p> <ul style="list-style-type: none"> • Article 6 (1)(f) Legitimate Interest: the processing is necessary for the purposes of the legitimate interests pursued by the Controller
<p>Recipient or categories of recipients of the data</p>	<p>The footage from the Body Cameras will be kept securely for its retention period. It may be viewed to investigate:</p> <ul style="list-style-type: none"> • allegations of violence and aggression to staff members, or the public • to support the Police in reducing and detecting crime

- to assist in identifying, apprehending and prosecuting offenders

Where necessary, the Trust may share footage with agencies involved in the prevention and detection of crime, including Greater Manchester Police. It may also be shared for the purposes of safeguarding vulnerable adults and children.

The legal basis used for sharing BWC footage is UK GDPR:

- **Article 6 (1) (c) Legal Obligation:** the processing is necessary to comply with the law; or
- **Article 6 (1) (e) Public Task:** the processing is necessary to perform a task in the public interest

Retention period - How long will we keep your data

BWC footage will be retained for a period of 30 days, unless it is required to be retained for a longer period as part of an investigation, in which case it will be copied to an alternative secure storage area within the 30 day period.

Footage required for an investigation will be retained in line with relevant legislation.

Your Rights

You have the right of access to BWC footage we hold about you. This is sometimes referred to as a Subject Access Request (SAR). To help us process your request we will require you to provide proof of your identity and some clarity about the information you require. A form is available to help with the request.

Please contact: Patient Advice and Liaison Services (PALS)
Tel: +44 (0)161 276 8686
Email: pals@mft.nhs.uk

This privacy notice supports your right to be Informed. For more information on the data we process and for details of your other rights under data protection legislation, please see our main privacy notice, link:

<https://mft.nhs.uk/privacy-policy/>